

- D. A Status Conference is scheduled for **October 24, 2024 at 11:00 AM via Zoom.**
- E. Plaintiffs shall file their Proposed Final Judgment and serve their initial witness list by **November 20, 2024.**
- F. The parties shall file a Joint Status Report regarding the status of discovery and preparation of Defendant's Proposed Final Judgment by **November 22, 2024.**
- G. A Status Conference is scheduled for **November 25, 2024 at 11:00 AM via Zoom.**
- H. Defendant shall file its Proposed Final Judgment and serve its initial witness list by **December 20, 2024.**
- I. The parties shall file a Joint Status Report regarding the status of discovery and preparation of their respective Revised Proposed Final Judgments by **January 6, 2025.**
- J. A Status Conference is scheduled for **January 9, 2025 at 11:00 AM via Zoom.**
- K. The parties shall file a Joint Status Report regarding the status of discovery and preparation of their respective Revised Proposed Final Judgments by **February 7, 2025.**
- L. A Status Conference is scheduled for **February 10, 2025 at 11:00 AM via Zoom.**
- M. Fact discovery shall conclude on **February 28, 2025.**
- N. The parties shall exchange final witness lists and file their respective Revised Proposed Final Judgments, as well as a Joint Status Report regarding the status of expert discovery, by **March 7, 2025.**
- O. A Status Conference is scheduled for **March 10, 2025 at 11:00 AM via Zoom.**
- P. The parties shall serve any proponent expert reports and disclosures, consistent with Rule 26(a)(2), by **March 14, 2025.**
- Q. The parties shall serve any rebuttal expert reports and disclosures, consistent with Rule 26(a)(2), by **March 26, 2025.**

- R. The parties shall exchange exhibit lists, and each party shall notify any non-party of (1) all documents produced by that non-party that are included in the party's exhibit list and (2) all deposition excerpts of that non-party that have been designated by the party, by **March 28, 2025**.
- S. The parties shall jointly file, and any non-party shall individually file, a position statement that specifies any objection(s) to the public disclosure of any documents or depositions designated by the parties, explains the basis for any such objection(s), and proposes redactions, where possible, by **April 2, 2025**. Any document filed with the intention of it being sealed must be accompanied by a motion to seal, pursuant to Local Civil Rule 5.1(h).
- T. The parties and any non-parties shall meet and confer regarding confidentiality designations by **April 8, 2025**.
- U. Expert discovery shall conclude on **April 9, 2025**.
- V. A Pre-Hearing Conference is scheduled for **April 11, 2025 at 10:00 AM in Courtroom 10**.
- W. An Evidentiary Hearing is scheduled to begin on **April 22, 2025 at 9:30 AM in Courtroom 10**, and end by **May 2, 2025**.
- X. The parties' post-hearing briefs shall be due two weeks after the conclusion of the Evidentiary Hearing.

II. Other Deadlines

Additional deadlines for pre-hearing submissions and closing arguments shall be set at a future date.

III. Extensions of Time

The parties may not extend by stipulation any of the deadlines set forth above. Instead, the parties must file a written motion requesting an extension of time. The motion must be filed at least three business days before the deadline the movant is seeking to extend. The motion must also state the basis for the extension; the effect, if any, that granting the motion will have on other deadlines; the number of previous extensions requested and granted to the moving party; and the opposing party's position on the motion, including any reasons given for refusing to consent. *See* LCvR 7. Motions for extension of time are discouraged and will be granted only upon good cause shown.

IV. Limits on Discovery


If the parties wish to place any limitations on written discovery or fact witness depositions (including Rule 30(b)(6) depositions), the parties shall meet and confer by **September 23, 2024**, and file a joint discovery plan by **September 24, 2024 at 12:00 PM**, which shall identify any areas of disagreement.

V. Discovery Disputes

In the event that an emergency discovery dispute arises, the parties shall jointly email Chambers (mehta_chambers@dcd.uscourts.gov) and the Courtroom Deputy, Mr. Alexander Burton (alexander_burton@dcd.uscourts.gov), to request a teleconference with the court. The email must include a concise description of the issue(s) in dispute and an explanation of each party's position. The parties may not file a discovery motion without leave of court.

Any non-urgent discovery dispute shall be raised in the parties' Joint Status Report.

Dated: September 18, 2024



Amit P. Mehta
United States District Judge